

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

CARMEN FIGUEROA,
Defendant

CR. No.: 04-10098-WGY

**MOTION TO JOIN DEFENDANT WILLIAM TEJADA'S MOTION TO PRECLUDE APPLICATION OF
ENHANCED GUIDELINE PENALTIES FOR "CRACK" COCAINE IN
CALCULATING DEFENDANT'S SENTENCE**

NOW COMES, Carmen Figueroa, the defendant in the above-captioned indictment and moves to join Defendant, William Tejada's motion which is set forth above.

IN SUPPORT, Defendant Figueroa states as follows:

1. Ms. Figueroa is in precisely the same position in this matter as Defendant Tejada. She is a co-defendant of Mr. Tejada's and was convicted with him of the offenses charged in the indictment on the same evidence.
2. Allowing Ms. Figueroa to join this motion and rely on Mr. Tejada's pleadings will promote judicial efficiency, reduce the costs of the litigation and prevent duplication of effort.

Respectfully submitted,
CARMEN FIGUEROA
By her Attorney;

Dated: December 13, 2005

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